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11 || *Counsel for Official Committee of Tort Claimants*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

14 | In re:

15 | PG&E CORPORATION

16 || -and-

**17 | PACIFIC GAS AND ELECTRIC COMPANY,**

## **Debtors.**

- 19     Affects PG&E Corporation
  - 20     Affects Pacific Gas and Electric Company
  - 21     Affects both Debtors

22 \*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)

**Bankruptcy Case  
No. 19-30088 (DM)**

## Chapter 11 (Lead Case) (Jointly Administered)

**DECLARATION OF KODY KLEBER IN  
SUPPORT OF *EX PARTE* MOTION OF  
THE OFFICIAL COMMITTEE OF  
TORT CLAIMANTS PURSUANT TO  
B.L.R. 9006-1 REQUESTING ORDER  
SHORTENING TIME FOR HEARING  
ON MOTION TO COMPEL  
PRODUCTION OF THIRD-PARTY  
CONTRACTOR DOCUMENTS**

Related Document: Dkt. No. 3205

[No hearing requested]

1 I, KODY KLEBER, do hereby declare under penalty of perjury as follows:

2 1. I am a Partner at Baker & Hostetler LLP, attorneys for the Official Committee of  
3 Tort Claimants (the “TCC”) in the above-captioned chapter 11 cases.

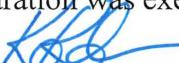
4 2. I submit this declaration in support of the Motion of the TCC (the “**Motion to**  
5 **Shorten**”), pursuant to Rule 9006-1 of the Bankruptcy Local Rules for the United States  
6 Bankruptcy Court for the Northern District of California, for entry of an order shortening time for  
7 a hearing on August 9, at 11:30 a.m. (the “**Motion to Compel Hearing**”), on the *Motion of the*  
8 *Official Committee of Tort Claimants to Compel Production of Third-Party Contractor Documents*  
9 (the “**TCC Motion**”) (Dkt. No. 3205). The TCC requests that written objections, if any, be due by  
10 4:00 p.m. (Pacific Time) on August 2, 2019.

11 3. For several months, the TCC has sought documents from Debtors relating to their  
12 third-party contractors’ potential responsibility for the 2018 Camp Fire. The third-party contractor  
13 discovery request is outlined in Request No. 25 of the Rule 2004 Application dated April 30, 2019.

14 4. On July 18, 2019, counsel for Debtors stated in an email correspondence to counsel  
15 for the TCC that Debtors hoped to substantially complete their production of documents responsive  
16 to Request No. 25 by July 19, 2019. On July 19, 2019, Debtors made a production of additional  
17 documents responsive to the TCC’s third-party related document requests, but the production did  
18 not include results or work product of any third-party contracted work. As of the filing of the TCC  
19 Motion, Debtors have not produced any third-party non-vegetation inspection records for the  
20 Caribou-Palermo Line, descriptions of work performed by third-party contractors (or any other  
21 work product), and any risk assessment documents specific to the Caribou-Palermo Line.

22 5. As a result of the Debtors’ failure to provide discovery, ample cause exists to hear  
23 the TCC Motion on shortened time at the Motion to Compel Hearing since absent relief from the  
24 Court, under Bankruptcy Local Rule 9014-1(c)(1) the TCC Motion cannot be heard for at least  
25 twenty-eight days from the date of filing.

26 I declare under penalty of perjury that, to the best of my knowledge and after reasonable  
27 inquiry, the foregoing is true and correct and that this declaration was executed on July 26, 2019.

28   
Kody D. L. Kleber